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10 Attorneys for Plaintiff
11 De Sol Corp., Inc.

12 UNITED STATES DISTRICT COURT
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14 NORTHERN DISTRICT OF CALIFORNIA
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16 (Oakland Division)

17 De Sol Corp., Inc., a California corporation,

18 Plaintiff,

19 vs.

20 Vegas Connection, Inc., a California
21 corporation; Omar Awad, an individual;
22 Jahangir Shahriari, an individual,

23 Defendants.

Case No. C07 4107 SBA

**PLAINTIFFS' OBJECTION TO
DEFENDANTS' NOTICE OF MOTION
AND MOTION TO TRANSFER FOR
IMPROPER VENUE, OR IN THE
ALTERNATIVE, TO TRANSFER FOR
CONVENIENCE**

**Hearing Date: December 18, 2007
Time: 1:00 p.m.
Dept.: 3**

24 Plaintiff hereby formally objects to Defendants' Notice of Motion and Motion to Transfer
25 for Improper Venue, or in the Alternative, to Transfer for Convenience, including the
26 declarations of Jahangir Shahriari and Bart Botta in support of said Motion, on the basis that said
27 Motion and supporting declarations were filed late. Said Motion was filed well beyond the time
agreed to by the parties for Defendants to answer or respond to Plaintiff's Complaint.

The parties expressly agreed that Defendants would file a responsive pleading to the
Complaint by no later than Friday, October 12, 2007. Declaration of Brandon L. Reeves in
Support of Opposition to Defendants' Motion to Transfer for Improper Venue, or in the

1 Alternative, to Transfer for Convenience ¶¶ 5-6, Ex 2. Defendants ignored their agreement with
2 Plaintiff and failed to respond as agreed, in a timely manner. The instant Motion and supporting
3 declarations were filed four days later on Tuesday, October 16, 2007, to the Plaintiff's detriment
4 and prejudice.

5 Accordingly, the Court should deny this Motion and allow Plaintiff to proceed with an
6 application for judgment by default pursuant to Federal Rule of Civil Procedure 55(b)(2).

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8 DATED: November 27, 2007

GREENE, CHAUVEL, DESCALSO & MINOLETTI

9 BY: _____
10 RONALD C. CHAUVEL
11 BRANDON L. REEVES
12 Attorneys for Plaintiff
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